

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

Hon. Michael A. Hammer

MATTHEW BRENT GOETTSCHÉ,
[DEFENDANT TWO],
JOBADIAH SINCLAIR WEEKS,
JOSEPH FRANK ABEL, and
SILVIU CATALIN BALACI

CRIMINAL NO.: 19-877-CCC

**DEFENDANT JOBADIAH SINCLAIR WEEKS' NOTICE OF FILING
DECLARATION IN SUPPORT OF MOTION FOR TEMPORARY RELEASE (D.E. 73)**

Defendant Jobadiah Sinclair Weeks, through his undersigned attorneys, hereby submits a brief declaration in support of his motion for temporary release (D.E. 73).

On March 23, 2020, Mr. Weeks filed an emergency motion for temporary release based on his health condition of suffering from exercise-induced asthma and the need to prepare for trial during the COVID-19 outbreak. Undersigned counsel was prepared to proceed by proffer on this emergency motion. However, on Friday, March 27, 2020, the government filed its supplemental letter/brief in opposition to Mr. Weeks' emergency motion. Although the government's supplemental filing does not directly contest Mr. Weeks' claim of suffering from exercise-induced asthma, its argument and attachments indirectly contest the existence of this condition. Accordingly, Mr. Weeks hereby submits the attached Declaration. *See Exhibit A, Declaration of Jobadiah Sinclair Weeks.* Because of the limitations on in-person attorney visits at the Essex County Correctional Facility, this Declaration is unsigned, but acknowledged by Mr. Weeks through the jail's instant messaging system.

DATED: March 29, 2020

CARLTON FIELDS

/s/ Simon Gaugush

Simon Gaugush, Esq.

Fla. Bar No. 0440050

4221 W. Boy Scout Blvd., Ste. 1000

Tampa, FL 33607

Telephone: 813.223.7000 (Fla.)

Facsimile: 813.229.4133 (Fla.)

and

Michael L. Yaeger, Esq.

405 Lexington Avenue, 36th Floor

New York, NY 10174

Telephone: 212.785.2577

Counsel for Defendant Jobadiah Weeks

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 29, 2020, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will serve an electronic copy to all counsel of record.

/s/ Simon Gaugush

Simon Gaugush, Esq.